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December 15, 2021

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dalaeja Foreman, et al. v. Metropolitan Transportation Authority, et al.*,
21-CV-3774 (NRB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I write to respectfully request that the Court execute the attached Stipulation of Confidentiality and Proposed Protective Order agreed to by all parties.

We thank the Court for its consideration herein.

Respectfully submitted,

Jeffrey F. Frank
Assistant Corporation Counsel
Special Federal Litigation Division

cc: All Counsel (via ECF)